

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
Amendment of Part 97 of the Commission's Rules	)	
To Implement WRC-03 Regulations Applicable to	)	WT Docket No. 05-235
Requirements for Operator Licenses in the	)	
Amateur Radio Service	)	

**To: The Commission**

I wholly support the Commission's Notice of Proposed Rulemaking (NPRM) as this NPRM is long overdue in the Amateur Radio Community.

While Morse Code is still a major part of what Amateur Radio is, and will always be, it makes sense that the Commission eliminate the requirement that persons wishing to upgrade from a Technician license to a General and/or Amateur Extra license.

Unlike 1912, for example, we have long had the ability to communicate by voice (phone) communications and are not limited by using straight Morse Code. And, in the last two decades, there's been an explosion in technology that allows Amateur Radio licensees to use things like packet radio and even Voice over IP (VOIP) technology that lets a licensee use their computers and a connection to the Internet to contact people in far away lands.

I support the removal of the requirement as it permits licensees to upgrade their privileges and makes the use of CW an optional thing. While there will certainly be many people that will file comments that oppose the removal of Morse Code, for fear that the Amateur Radio bands will degenerate into Citizen's Band radio. I do not totally share that opinion in that Morse Code still can get out, even when more modern forms of communications have failed and even when voice communications through the many frequency bands Amateur Radio operators are allocated have failed due to bad conditions.

Licensees should have the choice to learn Morse Code on a voluntary basis, and, this NPRM will certainly give licensees like myself the time needed to actually learn the code.

I strongly suspect that if this NPRM is passed, the best way to keep the code alive is to ensure that when future band plans come out, that there

is always room in the plan to give Morse Code it's own "dedicated" area, like it currently enjoys.

One of the petitions denied by the Commission stated that there was Homeland Security issues involved, and while there was little evidence to back up the claim, I do agree with that assessment because of the fact that during the immediate aftermath of the terrorist attacks in New York, Amateur Radio operators pitched in with as much help as they possibly could give despite their feelings of horror.

Also, in the 2003 blackout, Ham Radio Operators provided emergency communications when everything else was failing, as many Hams switched from their AC powered stations to handheld units and the radios in their personal vehicles. This was in the finest traditions of Ham Radio and, it's a logical extension of Homeland Security. I realize that the Commission wasn't convinced and therefore denied the aforementioned petition, however, I felt it was necessary to comment on this part of the NPRM as well.

Morse Code will always remain a vital part of Amateur Radio and even though the Commission is seriously considering dropping the requirement, Morse will never fully die out as mentors will continue to teach it because of it's rich and valuable history and constant contribution to Amateur Radio. "Elmers" simply will not allow this part of Ham Radio to fade away.

VE and VECs shouldn't be concerned about the loss of the requirements of Morse Code, as it makes their overall role and jobs easier in the long run as it's one less step that they must do to certify that "Joe Sixpack" is qualified to be and remain a Commission licensee.

As a Technician Class licensee, I have a vested interest in what is going to transpire in the next several months.

In conclusion, I urge the Commission to act with all due speed on this NPRM and to vote in a bipartisan fashion to approve this NPRM.

Thank you for your time.

Sincerely,

Dan Trigona, KD8AGU